

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHANNON TAYLOR, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

TRUSTED MEDIA BRANDS, INC.,

Defendant.

Civil Action No. 16-cv-01812-KMK

**NOTICE OF MOTION FOR ATTORNEYS' FEES, EXPENSES,
AND INCENTIVE AWARD**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on January 31, 2018 at 10:00 a.m. before the Honorable Kenneth M. Karas, United States District Judge for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, Plaintiff Shannon Taylor, by and through Class Counsel, will move and hereby does move for an order (1) approving the payment of attorneys' fees in the amount of one-third (33.33%) of the settlement fund, (2) granting Ms. Taylor an incentive award of \$5,000 in recognition of her efforts on behalf of the class, and (3) awarding such other and further relief as the Court deems reasonable and just.

PLEASE TAKE FURTHER NOTICE that, in support of the motion, Plaintiff will rely upon the accompanying memorandum of law in support, the Declaration of Shannon Taylor, and the Declaration of Joseph I. Marchese, with annexed exhibits.

Dated: December 5, 2017

Respectfully submitted,

By: /s/ Joseph I. Marchese
Joseph I. Marchese

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